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14 **UNITED STATES DISTRICT COURT**
15 **CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION**

16 LOS ANGELES PRESS CLUB,
17 STATUS COUP,

18 PLAINTIFFS,

19 v.

20 CITY OF LOS ANGELES, a municipal
21 entity, JIM MCDONNELL, LAPD
22 CHIEF, sued in his official capacity;

23 DEFENDANTS.

24 Case No. 2:25-CV-05423-HDV-E

25 Hon. Hernan D. Vera

26 **DECLARATION OF JORDAN**
27 **CHARITON**

Declaration of Jordan Chariton

I, Jordan Chariton, hereby declare

3 1. I am the founder and CEO of Status Coup. Status Coup is a progressive
4 independent investigative reporting network and media outlet that features
5 investigative and on-the-ground reporting on politics, corruption, the working class,
6 social justice, and the environment. Our mission is to put journalists on the ground
7 and talk to real people to find out what is really happening on-the-ground across
8 America and uncover stories that would otherwise be missed by large corporate
9 media outlets. Moreover, Status Coup has over 3,000 paying members who
10 financially support monthly and annually to receive this on-the-ground reporting.

11 2. On June 10th, 2025, one of our journalists Tina-Desiree Berg was on
12 assignment for Status Coup reporting on protests that were taking place in the
13 downtown LA Civic Center. She had a great position on an embankment where she
14 had a direct line of site that showed both the protestors and the LAPD squaring off.
15 Unfortunately, not long after arriving in that location she was arbitrarily removed
16 from that location by an LAPD. I watched the video Ms. Berg captured of the event.
17 Ms. Berg tried her best to capture the protest, but LAPD forced Ms. Berg to leave
18 the area by physically escorting her out of the Civic Center.

19 3. To service its mission Status Coup focuses on in-field and
20 investigative reporting around the country from both internal and external reporters.
21 In Los Angeles Status Coup reported on UTLA strikes, the Black Lives Matter
22 protests, the WiSpa Protest, the Dobbs protests, the Free Palestine protests, major
23 Bernie Sanders political rally attended by 36,000, and now the ICE protests.

24 4. This kind of journalism requires Status Coup journalists to be
25 embedded into the events they are covering. In the context of protests this means
26 Status Coup journalists have to be in close proximity to the skirmish lines among
27 police and protestors.

28 5. Ideally Status Coup could hire journalists to cover these events without

1 asking them to risk being shot, assaulted, seized, or removed from an area they are
2 allowed to be at by law. However, this ideal has not aligned with reality. Especially
3 during the ICE Protests LAPD has regularly used force or threat of force in a manner
4 that interferes with Status Coup's reporting.

5 6. When our journalists are injured or seized by LAPD that necessarily
6 frustrates Status Coup's news gathering function. Unfortunately, LAPD regularly
7 violates 409.7. In the last five years Ms. Berg alone has been shot at by LAPD
8 during the Floyd protests. Beaten by LAPD during the Dobbs protests. She was
9 pushed and shoved during Eco Park. And now she was kicked out of the Civic
10 Center during the ICE protests and that is just one of our journalists. Status Coup is
11 at its base an investigative reporting network. Status Coup is an organization
12 comprised of journalists-so this is a risk that everyone working for Status Coup
13 faces. We all go out into the field in tense situations.

14 7. This is obviously problematic because it prevents Status Coup
15 journalists from capturing the news which is highly detrimental to us as our whole
16 premise, and business model, is that we are dedicated to in-field investigative
17 journalism. When LAPD shoots, arrests, or threatens our journalists, that is all lost
18 time where that journalist could have been covering the story they were there to
19 cover. One of the largest sources of income for us is the licensing of videos captured
20 at these incidents. For example, one of our journalists captured the historic footage
21 on January 6th, 2021 of Capitol Hill police officer Daniel Hodges attacked by
22 supporters of President Trump to the point he was violently crushed into a door.
23 This historic footage was licensed by us to news outlets around the world, creating
24 great journalistic and historical impact while also garnering us significant licensing
25 revenue. To capture this newsworthy, and potentially historic footage, journalists'
26 have to be at the right place at the right time. When LAPD interferes with Status
27 Coup journalists, they are putting their thumbs on the scale and making it impossible
28 for this kind of journalism to be sustainable.

1 8. When LAPD shoots, arrests, or otherwise interferes with Status Coup
2 journalists it also forces us to redirect our time towards addressing LAPD's unlawful
3 actions. To protect our journalists, we are forced to use time that could otherwise
4 go towards making and distributing content towards advocating for our journalist's
5 safety. Status Coup has already had to release several videos illustrating LAPD's
6 unlawful interference with Tina Berg. We had to do the same thing in 2020 for the
7 Floyd protests and also in 2022 for the Dobbs protest. We can't really license these
8 videos, but we need LAPD's practice of seizing, assaulting, and shooting the press
9 to stop. This footage is the best tool we have to advocate for our journalists' safety.
10 However, the documentation of these incidents has apparently not been enough to
11 get LAPD to change its practices. Now, the problem has gotten so out of hand that
12 Status Coup is forced to dedicate precious time towards a lawsuit because nothing
13 else has worked. This lawsuit will require further resources to be redirected towards
14 advocating for these issues, as a small outfit every hour we cannot put towards
15 journalism is a material detriment to our mission.

16 9. LAPD is interfering with the very thing that makes Status Coup
17 dynamic and essential-embedded on the ground coverage. People engage with us
18 because they want to see uncut, unfiltered, entrenched journalism. That can't
19 happen if our journalists are forced to be a block away from where the protests are
20 happening. That cannot happen if our journalist are in the hospital because they got
21 thrown to the ground, or shot at, or are waiting to be released after being detained.

22 10. Independent Media is important; it captures a breadth and depth of
23 information that large corporate outfits are incapable of covering. However,
24 embedding journalists into the core of the story is resource intensive. That makes
25 journalist's time on the ground an invaluable resource for Status Coup. Every
26 minute counts and every journalist is an integral part of Status Coup's work.

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1 I declare under penalty of perjury under the laws of the United States of America
2 that the foregoing is true and correct. Executed this 25 day of June,
3 2025 at New York, New York.

Jordan Chariton

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5 Jordan Chariton
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